

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

JOHN M. FIFE, CHICAGO VENTURE
PARTNERS, L.P., ILIAD RESEARCH AND
TRADING, L.P., ST. GEORGE
INVESTMENTS LLC, TONAQUINT, INC.,
AND TYPENEX CO-INVESTMENT, LLC,

Defendants.

Civil Action No. 1:20-cv-05227

Honorable Martha M. Pacold
Honorable Daniel P. McLaughlin

JOINT STATUS REPORT

Pursuant to the Court’s Orders dated August 16, 2024 (*see* Dkt No.173) and October 7, 2024 (*see* Dkt No.175), Plaintiff United States Securities and Exchange Commission (“SEC”) and Defendants John M. Fife, Chicago Venture Partners, L.P., Iliad Research and Trading, L.P., St. George Investments LLC, Tonaquint, Inc., and Typenex Co-Investment, LLC (collectively, “Defendants,” and, together with the SEC, “the Parties”), respectfully submit this Joint Status Report. The Parties state as follows:

A. Status of Expert Discovery

On September 27, 2024, the SEC provided Defendants with rebuttal reports from two of the SEC’s expert witnesses. Also on September 27, 2024, Defendants provided the SEC with rebuttal reports from two of Defendants’ expert witnesses. After mutual agreement between the parties for a short extension based on one of the Defendants’ expert witnesses’ illness, on September 30, 2024, Defendants provided the SEC with a rebuttal report from another of

Defendants' expert witnesses. The Parties have scheduled depositions of the Parties' respective expert witnesses for various dates ranging from late October to mid-November.

On August 22, 2024, the SEC's counsel emailed Defendants' counsel and requested certain documents relating to the expert reports from certain of Defendants' experts. On September 4, 2024, Defendants provided the SEC with some of the documents that the SEC had requested. On September 6, 2024, Defendants' counsel emailed the SEC's counsel and stated that Defendants would agree to produce some additional documents that the SEC had requested, but would not agree to produce all of the requested documents. On September 17, 2024, the SEC propounded its Fourth Set of Document Requests. On September 20, 2024, Defendants produced the additional documents they had previously agreed to produce that the SEC had requested by email. On September 25, 2024, the Parties held a meet-and-confer meeting by videoconference regarding the SEC's document requests. The Parties did not resolve their differences during the meet-and-confer but stated that they sought to resolve these differences without Court action. If the Parties are unable to resolve their differences and the SEC files a motion to compel, the SEC will seek to postpone the deposition of one of Defendants' experts, currently scheduled for November 12.

B. Statement Regarding Settlement Discussions

There have been no recent discussions of a settlement. The Parties do not request a settlement conference at this time.

C. Other Matters

There are no other matters that the Parties wish to bring to the Court's attention at this time.

DATED: October 15, 2024

/s/ Eric M. Phillips

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Counsel for Defendants

** Pro hac vice*

CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of October, 2024, I electronically filed a copy of the foregoing Joint Status Report through the Court's CM/ECF System, which will send notifications of the filing to all counsel of record.

/s/ Eric M. Phillips